

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CHARLES ROBINSON,

Plaintiff,

v.

TELESECTOR RESOURCES GROUP, INC. D/B/A )  
VERIZON SERVICES GROUP, )

Defendant. )

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Civil Action No. 04-11964-NG

**ASSENTED TO MOTION TO EXTEND TIME TO FILE REPLY MEMORANDUM IN  
SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant, Telesector Resources Group, Inc. d/b/a Verizon Services Group ("Verizon"), respectfully requests that the Court extend from November 21, 2005 to December 2, 2005 the date by which Verizon must submit its Reply Brief to its Motion for Summary Judgment.

In support of this request for an extension of time, Verizon states:

1. Defendant filed its Motion for Summary Judgment on October 21, 2005.
2. Pursuant to this Court's Order, Plaintiff's Opposition to Defendant's Motion was due on or before November 10, 2005, and Defendant's Reply, if any, was scheduled to be due on or before November 21, 2005.
3. On November 8, 2005, Plaintiff filed an Assented to Motion for Extension of Time to file his Opposition to November 17, 2005. In assenting to the Motion for Extension of Time, the parties agreed that Defendant would receive a concomitant extension for filing its Reply. Such agreement was not reflected in the Motion for Extension of Time.
4. On November 16, 2005, the Court granted Plaintiff's Motion for Extension of Time.
5. Plaintiff served his Opposition on November 17, 2005.

6. Because of the extension of time received by Plaintiff in filing his Opposition, coupled with the Thanksgiving holiday, Defendant requests an extension of time to file its Reply from November 21, 2005 to December 2, 2005.

7. Plaintiff's counsel has authorized Defendant to represent to the Court that Plaintiff, through Attorney Frank L. Fragomeni, assents to the extension requested in this motion.

8. This motion is made within the time originally prescribed in accordance with Fed. R. Civ. P. 6, in good faith, and with no intent to delay these proceedings. The extension will not affect the timing of any other deadline and will not delay any hearing, conference or trial in this matter.

9. This is Defendant's first request for extension of this deadline. Although Plaintiff will not be prejudiced if the Court grants this motion, Defendant will be prejudiced in its ability to prepare its Reply if the Court denies it.

WHEREFORE, Defendant respectfully requests that the Court grant this motion and order that the time for submitting its Reply brief to its Motion for Summary Judgment be extended until and including December 2, 2005.

Respectfully submitted,

The Defendant,  
TELESECTOR RESOURCES GROUP, INC.  
D/B/A VERIZON SERVICES GROUP,  
By its attorneys,

/s/ John P. McLafferty  
John P. McLafferty, BBO #639179  
Felix J. Springer (pro hac vice)  
DAY, BERRY & HOWARD LLP  
One International Place  
Boston, Massachusetts 02110  
(617) 345-4600

Assented to:

/s/ Frank L. Fragomeni  
Frank L. Fragomeni, Jr., BBO #176990  
FRAGOMENI & CAREY  
15 Broad Street, Suite 501  
Boston, Massachusetts 02109  
(617) 523-6511

DATED: November 18, 2005

**CERTIFICATE OF SERVICE**

I, John P. McLafferty, do hereby certify that on this 18th day of November, 2005, I caused a true copy of the foregoing to be delivered via first class mail, postage prepaid to Frank L. Fragomeni, Jr., Esquire, 15 Broad Street, Suite 501, Boston, Massachusetts 02109.

/s/ John P. McLafferty  
John P. McLafferty